UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

OPTIS WIRELESS TECHNOLOGY, LLC, OPTIS CELLULAR TECHNOLOGY, LLIC, UNWIRED PLANET, LLC, UNWIRED PLANET INTERNATIONAL LIMITED, AND PANOPTIS PATENT MANAGEMENT, LLC.,

Plaintiffs,

v.

APPLE INC.,

Defendant.

Case No. 2:19-CV-0066-JRG

JOINT MOTION TO ENTER DISCOVERY ORDER

Pursuant to the Court's June 5, 2019 Order (ECF No. 35), the parties have reached agreement on the terms of a Discovery Order and now respectfully move to enter it. A copy of the agreed proposed Discovery Order is attached hereto.

Respectfully submitted,

Dated: July 15, 2019 /s/ Samuel Baxter

Samuel F. Baxter (Tex. Bar No. 01938000) sbaxter@mckoolsmith.com Jennifer Truelove (Tex. Bar No. 24012906) jtruelove@mckoolsmith.com MCKOOL SMITH, P.C. 104 East Houston, Suite 300

Marshall, TX 75670 Telephone: 903-923-9000 Facsimile: 903-923-9099

Steven Pollinger (Tex. Bar No. 24011919) spollinger@mckoolsmith.com MCKOOL SMITH, P.C. 300 W. 6th St., Suite 1700 Austin, Texas 78701

Telephone: 512-692-8700 Facsimile: 512-692-8744

Jason Sheasby (pro hac vice) jsheasby@irell.com
Hong Zhong, PhD
hzhong@irell.com
IRELL & MANELLA LLP
1800 Ave of the Stars, Suite 900
Los Angeles, CA 90064
Telephone: 310-203-7096

Facsimile: 310-203-7199

Attorneys for Plaintiffs Optis Wireless Technology, LLC, Optis Cellular Technology, LLC, Unwired Planet, LLC, Unwired Planet International Limited, and PanOptis Patent Management, LLC

Respectfully submitted,

Dated: July 15, 2019 /s/ Mark D. Selwyn

Mark D. Selwyn (pro hac vice) mark.selwyn@wilmerhale.com WILMER CUTLER PICKERING HALE AND DORR LLP 950 Page Mill Road Palo Alto, CA 94304 Telephone: (650) 858-6000

Telephone: (650) 858-6000 Facsimile: (650) 858-6100

Mindy Sooter (*pro hac vice*) mindy.sooter@wilmerhale.com WILMER CUTLER PICKERING HALE AND DORR LLP 1225 Seventeenth Street, Suite 2600 Denver, CO 80202 Telephone: (720)274-3135

Telephone: (720)274-3135 Facsimile: (720) 274-3133

Timothy D. Syrett (*pro hac vice*) timothy.syrett@wilmerhale.com WILMER CUTLER PICKERING HALE AND DORR LLP 60 State Street Boston, MA 02109 Telephone: (617) 526-6000

Telephone: (617) 526-6000 Facsimile: (617) 526-5000

Brittany Blueitt Amadi (*pro hac vice*) brittany.amadi@wilmerhale.com WILMER CUTLER PICKERING HALE AND DORR LLP 1875 Pennsylvania Avenue NW Washington, DC 20006 Telephone: (202) 663-6000

Facsimile: (202) 663-6363

Melissa R. Smith State Bar No. 24001351 melissa@gillamsmithlaw.com GILLAM & SMITH, LLP 303 South Washington Avenue Marshall, Texas 75670 Telephone: (903) 934-8450

Facsimile: (903) 934-9257

Attorneys for Defendant Apple Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on July 15, 2019 on all counsel who have consented to electronic service.

/s/ Jennifer Truelove

Jennifer Truelove